

From: [Richard Collins](#)
To: [Mike McGlamry](#); E-File; [Mike McGlamry](#)
Cc: [Caroline McGlamry](#); [Nola Delaney](#); [Winslow Robinson](#); [Bruce E](#)
Subject: NOTICE: GEORGIA BAR COMPLAINT - MOTION TO EDPA FOR SANCTIONS - ATTORNEY'S LIEN: Reginald D. BROWN (100001915)
Date: Monday, December 5, 2022 7:19:14 PM
Attachments: [image001.png](#)
[11 01 22 - McGlamry - Withdraw of Lien.pdf](#)
[12 21 16 - McGlamry - Petition - Reginald D Brown.pdf](#)
[09 07 22 - ADDENDUM TO 2016 DISMISSAL LETTER, WITH CAUSE.pdf](#)
[GA Grievance-Form.pdf](#)
[image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

EXTERNAL EMAIL

Mr. McGlamry,

As you are well aware, we represent Mr. Reginald D. Brown in the NFL Concussion Litigation.

We have record that you represented Mr. Brown in this matter from 2012 to 2016, at which time Mr. Brown sent you a Withdraw from Representation with cause letter (attached). Based upon our through research of your representation during the above noted time, you did little to nothing to specifically advance Mr. Brown's cause of action against the NFL. You never had Mr. Brown tested by a NFL qualified neurologist and neuropsychologist, and you never registered him for the NFL Concussion Litigation, among other legal representation shortcomings.

However, most strikingly, you misrepresented the truth in your Petition to Establish Attorney's Lien, filed with the Eastern District of Pennsylvania Federal Court, on December 21, 2016, where you boldly state that Mr. Brown withdrew from your representation **without** cause, when he in fact withdrew from your representation with cause in no uncertain terms. This is a very serious offense of **fraudulent misrepresentation** both under Georgia and Federal law; whether executed recklessly or intentionally:

"The Petitioner was not terminated by the Plaintiff for cause, and the termination was not due to any malfeasance or other improper action on the part of the Petitioner."

To add insult to injury, in your Petition, you discuss alleged activity that you partook in prior to 2016 that was set forth to benefit your law firm generally, and your inventory of retired NFL players generally, but no discussion of what you did to verifiably advance Mr. Reginald D. Brown's case specifically. You simply state that your general activity "*inure[d] to the benefit of . . . Mr. Brown.*" It did not. Further, during the dates between 2012 and 2016 there was a grievous lack of communication with Mr. Brown even though he had reached out to you repeatedly during this time, to no avail.

For the past few months we have been trying to talk Mr. Brown out of filing an official Georgia Bar Complaint against you for all of the grievances, most especially for outright lying on your Petition for Attorney's Lien when you state that Mr. Brown withdrew from your representation **without** cause, and have the gumption to further expound upon that false

statement (*termination was not due to any malfeasance or other improper action on the part of the Petitioner*). Your statement here has enraged Mr. Brown beyond measure, causing him to draft a Georgia Bar Complaint, and to go as far as submitting an Amendment to his original 2016 Withdraw from Counsel from the Pope, McGlamry law firm to the NFL Claims Administrator, reaffirming that he withdrew with cause from your benign representation in 2016.

Mr. Brown is prepared to give you one opportunity to completely withdraw your attempt at holding a lien on his NFL Concussion Settlement before he proceeds with his Georgia Bar Complaint, and having us file a Motion for Sanctions in the Eastern District of Pennsylvania Federal Court (EDPA), very publicly under the 2:12-md-2323 lawsuit.

Mr. Brown expects to see an expeditious Notice of Withdraw of Attorney's Lien filed in the EDPA and emailed to claimsadministrator@nflconcussionsettlement.com by, or before Friday, December 9, 2022, before he rescinds his Georgia Bar Complaint, and we agree not to publicly file a Motion for Sanctions, with specificity in the Federal Court. Please see the Withdraw of Attorney's Lien template attached herein for your reference (your 11/1/22 filing).

Finally, as a concession, we have barely convinced Mr. Brown to convey to you \$2,500 from his eventual NFL Concussion Settlement funds for what efforts you exerted allegedly on his behalf prior to his 2016 withdraw from your representation with cause.

This law firm charges only 15% of the net recovery on our NFL cases, whereas you were initially requesting a whopping 40% of Mr. Brown's hard-fought NFL Concussion Settlement (until the Federal Judge was required to step in and had to cap your egregious fees). This fact has further enraged our client, Reginald D. Brown, as to the true intentions of your law firm, and to the lack of quality representation from the Pope, McGlamry law firm that he had experienced.

Please govern yourself accordingly. This law firm customarily does not confront lien disputes in this manner. However, due to the level of overt misrepresentation and opportunism here, combined with the level of anger our aggrieved client has reached due to the fraudulent misrepresentation to the Federal Court directly relating to his claim, we are regretfully compelled to address your lien in this manner.

As per your October 13, 2022 email to this firm, there is nothing to discuss. Either comply, or don't comply, and we will reposed accordingly. This is our official attempt at resolving this lien.

Regards,

Dick Collins, Esq.

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On Oct 13, 2022, at 4:30 PM, Mike McGlamry <mmcglamry@pmkm.com> wrote:

Mr. Collins, we represented Reggie from 12/29/11 until a termination letter in 2016. We received the Notice of Duty to Resolve Lien Dispute. If you would like to discuss a resolution, please give me a call at 404-523-7706. Thanks, Mike.